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*Attorneys for Defendant*  
*Multi Media, LLC*

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

WAG ACQUISITION, L.L.C.,

Plaintiff,

v.

MULTI MEDIA, LLC, f/k/a Zmedianow, LLC,  
d/b/a chaturbate.com; HEARILLE SERVICES  
LIMITED, d/b/a chatbill.com; CWIE, LLC, d/b/a  
Cavecreek Wholesale Internet Exchange,  
Cavecreek Web Hosting, and  
highwebmedia.com; CCBILL, LLC; CWIE  
HOLDING COMPANY, INC.; and DOES 1-20,

Defendants.

Civil Action No. 14-02340 (ES) (JAD)

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**ORAL ARGUMENT REQUESTED**

**NOTICE OF MOTION FOR PARTIAL  
DISMISSAL UNDER RULE 12(B)(6)**

MOTION DATE: JUNE 16, 2014

**ON NOTICE TO:**

Ronald Abramson  
David G. Liston  
**LEWIS BAACH pllc**  
The Chrysler Building  
405 Lexington Avenue  
New York, NY 10174  
Telephone: (212) 826-7001

*Attorneys for WAG Acquisition, LLC*

**PLEASE TAKE NOTICE** that Defendant Multi Media LLC (“Multi Media”), pursuant to Federal Rule of Civil Procedure 12(b)(6) and Local Civil Rule 7.1, will respectfully move this Court at Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, New Jersey 07101 on June 16, 2014, or a date to be set by this Court, for an order dismissing Plaintiff’s claims for willful and indirect infringement for failure to state a claim on which relief can be granted.

**PLEASE TAKE FURTHER NOTICE** that in support of this motion, Defendant shall rely on the accompanying Opening Brief in Support of Defendant’s Motion for Partial Dismissal Under Rule 12(b)(6), which is filed contemporaneously herewith.

Respectfully submitted,

s/ Leda Dunn Wettre  
Leda Dunn Wettre  
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*Attorneys for Defendant*

*Multi Media, LLC*

Dated: May 21, 2014

**CERTIFICATE OF SERVICE**

I, **LEDA DUNN WETTRE**, hereby certify that on May 21, 2014, on behalf of Defendant Multi Media, LLC (“Multi Media”), I caused a true and correct copy of Defendant’s Motion for Partial Dismissal under Fed. R. Civ. P. 12(b)(6) and all supporting papers to be served to the following attorneys by the means below:

**BY ECF and EMAIL:**

Ronald Abramson  
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I further certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: May 21, 2014

s/ Leda Dunn Wettre  
Leda Dunn Wettre